



**Association of American  
Veterinary Medical Colleges**  

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**American Veterinary Medical Association**



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February 9, 2011

Drs. Lawrence Tabak and Alan Guttmacher  
Co-Chairs, NCRF Task Force  
Office of the Director  
National Institutes of Health  
6705 Rockledge Drive, Suite 750  
Bethesda, MD 20892  
<http://feedback.nih.gov/index.php/ncats/straw-model/>

Dear Co-Chairmen Tabak and Guttmacher, and Members of the NIH NCRF Task Force:

As the nation's sole representative for veterinary medical colleges, departments of comparative medicine, and departments of veterinary science, and as the national veterinary professional association representing more than 83% of US veterinarians, the Association of American Veterinary Medical Colleges (AAVMC), and the American Veterinary Medical Association (AVMA), respectfully, write this letter to provide comments and recommendations on the National Center for Research Resources (NCRF) Task Force Straw Model showing the proposed new National Institutes of Health (NIH) homes for current NCRF programs.

We recognize the importance of the NIH's initiative to create the National Center for Advancing Translational Sciences (NCATS), and welcome the potential benefits to our nation's health of an invigorated focus on translational medicine and therapeutics. Our AAVMC member institutions and AVMA member veterinarians are proud of their significant contributions toward improving human health through transdisciplinary involvement and collaboration in translational research and comparative medicine. The support offered by NCRF programs and resources to our veterinary medical educational and research institutions, faculty, and members, have made possible their important contributions to our nation's health, and we greatly appreciate the opportunity to provide comment and recommendations to further advance the successes of critical NCRF programs.

In review of the Straw Model, we have the following comments:

1. To successfully fulfill its mission of accelerating the development and delivery of new, more effective therapeutics, the NCATS will rely on a diversity of appropriately trained laboratory scientists and clinical researchers capitalizing on the development of tools and technologies and making discoveries at molecular and cellular levels that can be tested and proven in animal based studies.
2. Although a logical and rational argument can be made for including NCRR's Clinical and Translational Science Award (CTSA) program, which is designed to develop teams of investigators from various fields of research who can transform scientific discoveries made in the laboratory into treatments and strategies for patients in the clinic, into the new NCATS, the same cannot be said for excluding and dismembering other components of NCRR, such as animal resources, training programs, and high-end instrumentation and technologies which are so critical to NCATS mission.
3. Further, as indicated in the NCRR Task Force Straw Model, proposing to subdivide these other NCRR components disrupts the extant scientific synergies that have been demonstrated meritorious to date, and forfeits the strategic relationships that have been built between programs over the last 20 years. For example, splitting the animal resources into different administrative structures erects a bureaucratic obstacle that needlessly hinders the flow of basic scientific discoveries made in induced genetic mutations in mice to clinically applicable mechanisms-of-action studied and tested in non-human primates.
4. Although it is expected that following this restructuring, NCRR will no longer exist as a center, a rational consideration would be to maintain a large component of NCRR programs together after reassignment of the CTSA program within the new NCATS. Those charged with making these decisions should be mindful that NCRR's unique, cross-cutting programs are and have been successful through careful planning, thoughtful leadership, and effective management by its administrative and scientific staff, program officers, and officials who understand these programs and are most qualified to ensure continued success of their respective programs and initiatives.

We, the AAVMC member institutions, with our specific expertise and engagement in comparative medicine, and the AVMA, which represents all aspects of the veterinary medical profession, therefore strongly recommend that the NCRR's Division of Comparative Medicine (both programs and staff) be retained as a functional entity after reassignment of the CTSA program. The optimal location of the unit within the NIH (e.g., NCATS, National Institute of

General Medical Sciences, or Office of the Director), should be carefully deliberated with input from NCRR staff and stakeholders.

The leadership of the AAVMC and AVMA requests the opportunity to meet with the NCRR Task Force to provide comments and informed recommendations on the Straw Model. Please contact either the AAVMC (202-371-9195, ext 115; [mpappa@aavmc.org](mailto:mpappa@aavmc.org)) or the AVMA (800-248-2862, ext 6775; [rdehaven@avma.org](mailto:rdehaven@avma.org)) at your earliest convenience so that we may make arrangements for such a meeting.

Sincerely,



Marguerite Pappaioanou, DVM, MPVM, PhD, Dip ACVPM  
Executive Director  
Association of American Veterinary Medical Colleges



W. Ron DeHaven, DVM, MBA  
Executive Vice President, CEO  
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The Association of American Veterinary Medical Colleges (AAVMC) is a non-profit membership organization working to protect and improve the health and welfare of animals, people and the environment by advancing academic veterinary medicine. Its members include all 33 veterinary medical colleges in the United States and Canada, nine departments of veterinary science, eight departments of comparative medicine, three veterinary medical education institutions, nine international colleges of veterinary medicine, and five affiliate international colleges of veterinary medicine. On the Web: <http://www.aavmc.org>

The American Veterinary Medical Association (AVMA), established in 1863, is a not-for-profit association representing more than 81,500 veterinarians working in private and corporate practice, government, industry, academia, and uniformed services. Structured to work for its members, the AVMA acts as a collective voice for its membership and for the profession. On the Web: <http://www.avma.org>